

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: : **CHAPTER 13**
John Flaton, III :
:
: **BANKRUPTCY NO.: 16-18349 ELF**

**OBJECTION TO CERTIFICATION OF DEFAULT FILED BY
U.S. BANK NATIONAL ASSOCIATION**

Debtor, by his attorney, Erik B. Jensen, Esq., hereby submits the instant objection to Movant's certification, filed on or about December 14, 2017, denying any and all averments contained therein. Debtor has the funds to cure all arrears.

WHEREFORE, Debtor prays that Movant's request for relief be denied.

JENSEN BAGNATO, P.C.

By: /s/ Erik B. Jensen
Erik B. Jensen, Esquire
Attorney for the Debtor